Case 1:21-mc-00122-JMS-RT Document 1-2 Filed 03/25/21 Page 1 of 64 PageID #: 7



KERRY S. CULPEPPER *

CULPEPPER IP, LLLC



JOSHUA LEE**

** ADMITTED TO PRACTICE IN

WASHINGTON AND BEFORE THE USPTO

ADMITTED TO PRACTICE IN VIRGINIA, HAWAI'I AND BEFORE THE USPTO

ATTORNEY AT LAW 75-170 HUALALALROAD SUITE B204 KAILUA-KONA, HI 96740

> TEL: (808) 464-4047 FAX: (202) 204-5181

WWW.CULPEPPERIP.COM

PATENTS, TRADEMARKS & COPYRIGHTS

Via Email: <abuse@cloudflare.com>

Via First Class Mail

Copyright Agent, Justin Paine Cloudflare 101 Townsend Street Legal Department San Francisco, CA 94107

March 25, 2021

Re: Copyright Claim of allegation of contributory copyright infringement on websites registered or affiliated with Cloudflare

Dear Sir or Madam:

A physical or electronic signature of the copyright owner, or a person authorized to act on behalf of the owner, of an exclusive copyright that has allegedly been infringed.

Joshua Lee authorized to act on behalf of owner American Cinema International, Inc. and Fallen Productions, Inc.

/Joshua Lee/

Identification of the copyrighted work claimed to have been infringed, or, if multiple copyrighted works at a single online site are covered by a single notification, a representative list of such works on that site.

Infringement of the motion picture **Angel Has Fallen** at the website: http://www.movieffm.net/movies/angel-has-fallen

Infringements of the motion picture **Infidel** at the websites:

https://92-tv.xyz/vod/play/id/25865/sid/6/nid/1.html https://92-tv.xyz/vod/play/id/25865/sid/5/nid/1.html

https://92-tv.xyz/vod/play/id/25865/sid/2/nid/1.html https://92-tv.xyz/vod/play/id/25865/sid/1/nid/1.html https://94-tv.xyz/vod/play/id/25865/sid/6/nid/1.html https://94-tv.xyz/vod/play/id/25865/sid/1/nid/1.html https://94-tv.xyz/vod/play/id/25865/sid/5/nid/1.html https://94-tv.xyz/vod/play/id/25865/sid/2/nid/1.html https://17drama.org/vod/play/id/25865/sid/6/nid/1.html https://17drama.org/vod/play/id/25865/sid/1/nid/1.html https://17drama.org/vod/play/id/25865/sid/5/nid/1.html https://17drama.org/vod/play/id/25865/sid/2/nid/1.html https://www.92-tv.com/vod/play/id/25865/sid/6/nid/1.html https://www.tiktokvideodown.com/vod-play-id-246091-sid-2-pid-1.html https://www.tiktokvideodown.com/vod-play-id-246091-sid-1-pid-1.html https://www.awsltv.com/vodplay/232225-1-1.html https://cn.tvju.tv/vodplay/142308-1-1.html https://cn.52ys.tv/vod/play/id/142308/sid/1/nid/1.html https://www.imvod.tv/vodplay/142308-1-1.html https://www.funtv.cc/play/142308/1-1.html https://www.17tv.tv/vp/42200-1-1.html https://tw.fun-tv.net/vod/play/id/25865/sid/6/nid/1.html https://tw.fun-tv.net/vod/play/id/25865/sid/1/nid/1.html https://tw.fun-tv.net/vod/play/id/25865/sid/5/nid/1.html https://tw.fun-tv.net/vod/play/id/25865/sid/2/nid/1.html https://gimy.club/vod/play/id/25865/sid/6/nid/1.html https://gimy.club/vod/play/id/25865/sid/2/nid/1.html https://gimy.club/vod/play/id/25865/sid/5/nid/1.html https://gimy.club/vod/play/id/25865/sid/1/nid/1.html https://www.duboju.tv/vodplay/118178-1-1.html https://www.ricevod.com/videoplay/142308-1-1.html https://www.17ys.net/vodplay/142308-1-1.html https://www.mmov.cc/vod/play/id/142308/sid/1/nid/1.html

Identification of the material that is claimed to be infringing or to be the subject of infringing activity and that is to be removed or access to which is to be disabled, and information reasonably sufficient to permit cloudflare.com to locate the material.

https://www.msyy.cc/play/55457-1-1.html

Page 3

(1) stream and copy of the motion picture <u>Angel Has Fallen</u> distributed at following web domain/IP address:

Website	IP address
Movieffm.net	104.21.234.88

(2) streams and copies of the motion picture <u>Infidel</u> distributed at following web domains/IP addresses:

Website	IP address
92-tv.xyz	104.21.61.105
94-tv.xyz	104.21.30.79
17drama.org	104.21.80.110
92-tv.com	104.21.47.21
Tiktokvideodown.com	104.21.234.8
Awsltv.com	104.21.32.132
Cn.tvju.tv	104.26.0.6
Cn.52ys.tv	104.21.75.25
Imvod.tv	104.26.2.221
Funtv.cc	104.21.74.24
17tv.tv	104.26.0.163
Tw.fun-tv.net	104.21.24.185
Gimy.club	104.21.15.224
Duboju.tv	104.26.14.127
Ricevod.com	104.21.3.20
17ys.net	104.21.88.254
Mmov.cc	104.21.39.236
Msyy.cc	104.21.17.127

Information reasonably sufficient to permit cloudflare.com to contact the Complaining Party, such as an address, telephone number, and, if available, an electronic mail address at which the Complaining Party may be contacted.

Joshua Lee, Esq.,

Culpepper IP, LLLC,

75-170 Hualalai Road,

Suite B204,

Kailua-Kona, Hawaii 96740

US Tel 1-808-464-4047

joshua.lee@culpepperip.com

A statement that the Complaining Party has a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

I have a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

Further, I have considered fair use.

A statement that the information in the notification is accurate, and under penalty of perjury, that the Complaining Party is the owner, or is authorized to act on behalf of the owner, of an exclusive right that is allegedly infringed.

The information in the notification is accurate, and under penalty of perjury, I am authorized to act on behalf of the owners, <u>Fallen Productions</u>, <u>Inc.</u> and <u>American Cinema</u> International, Inc. of an exclusive right that is allegedly infringed.

Sincerely, /Joshua Lee/ Joshua Lee

Attachment: Screenshots

17tv.tv



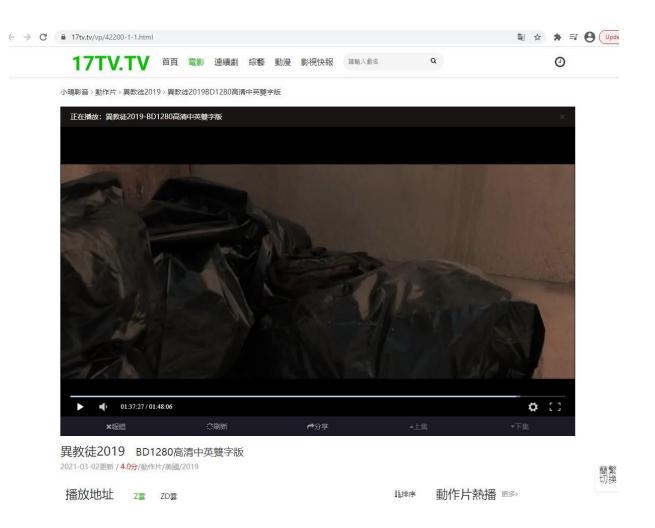
異教徒2019 BD1280高清中英雙字版

2021-03-02更新 / 4.0分/動作片/美國/2019

播放地址 Z雲 ZD雲

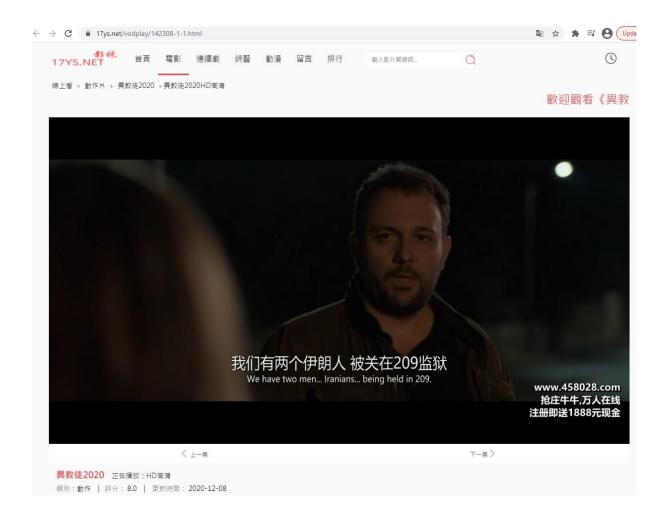
単序 動作片熱播 更多

簡繁 切換



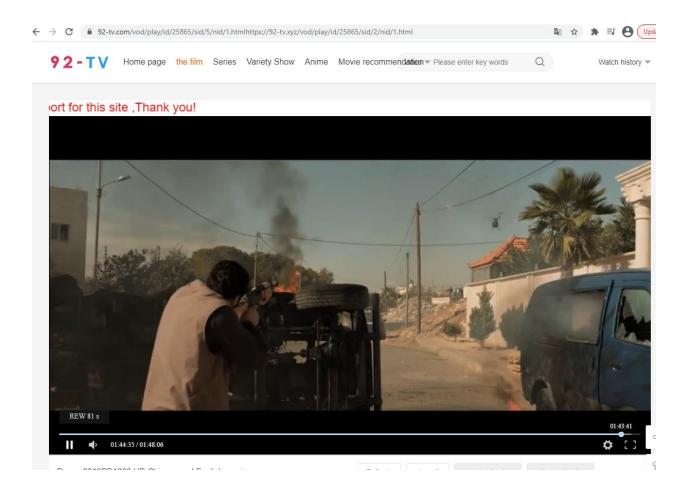
17ys.net



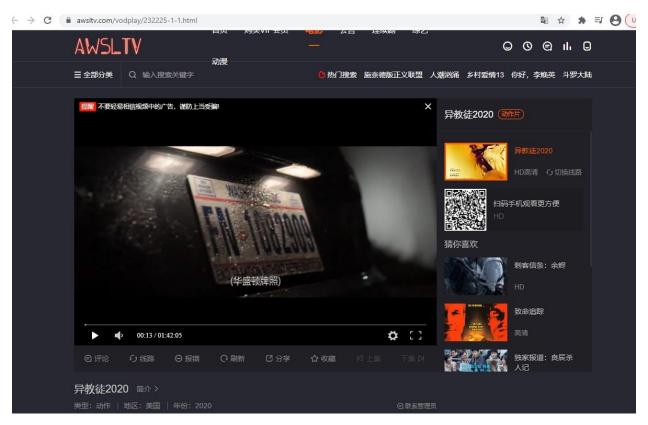


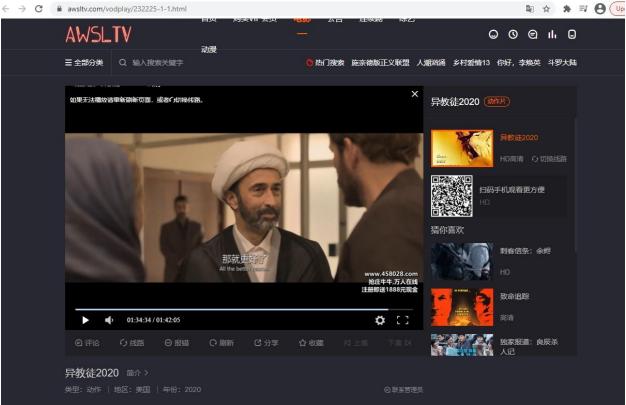
92-tv.com





Awsltv.com



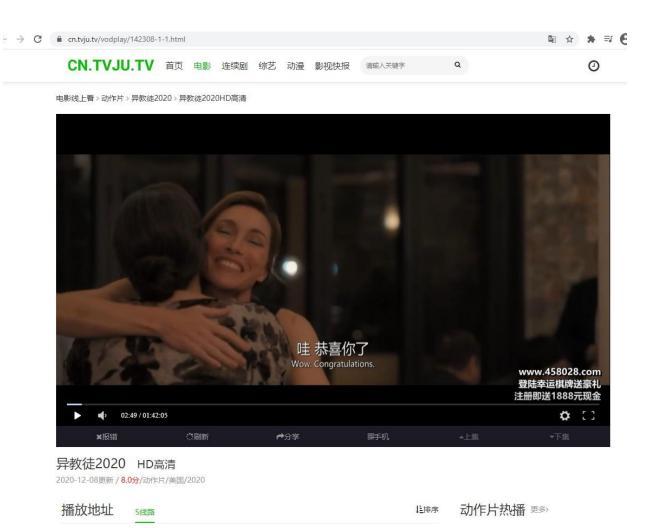


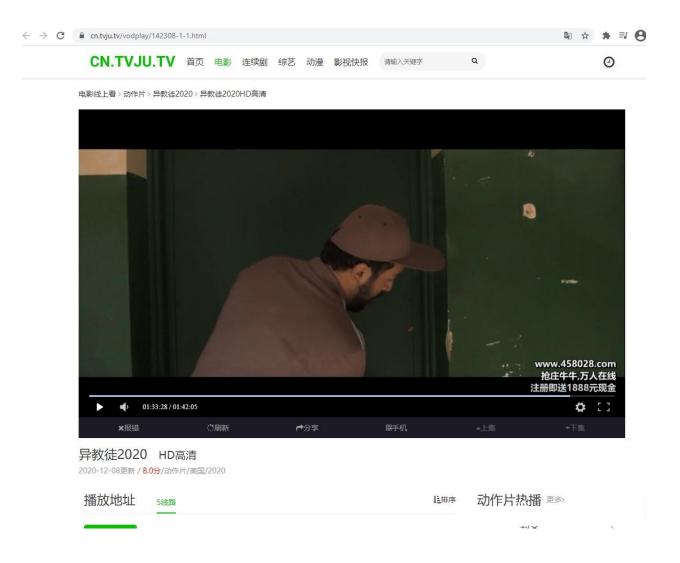
Cn.52ys.tv



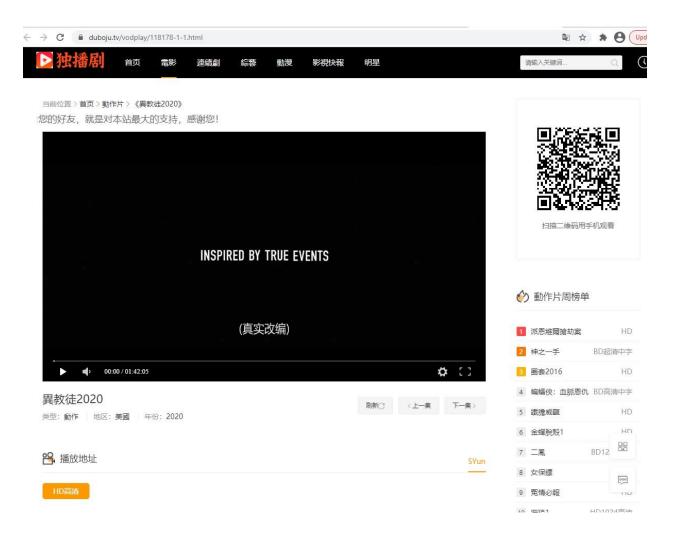


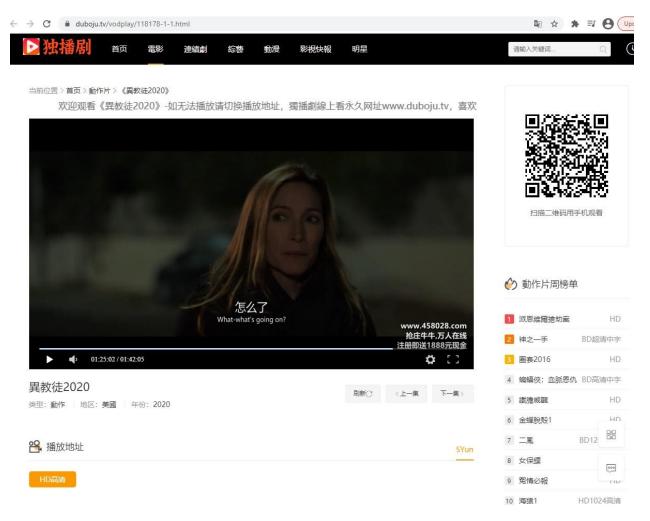
Cn.tvju.tv



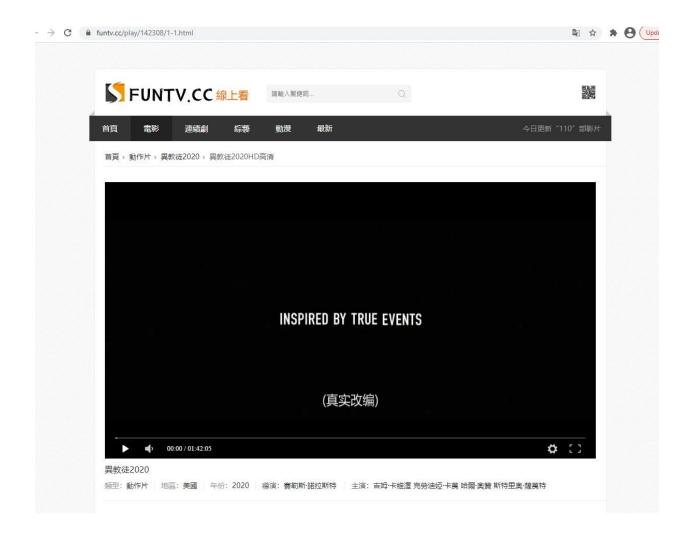


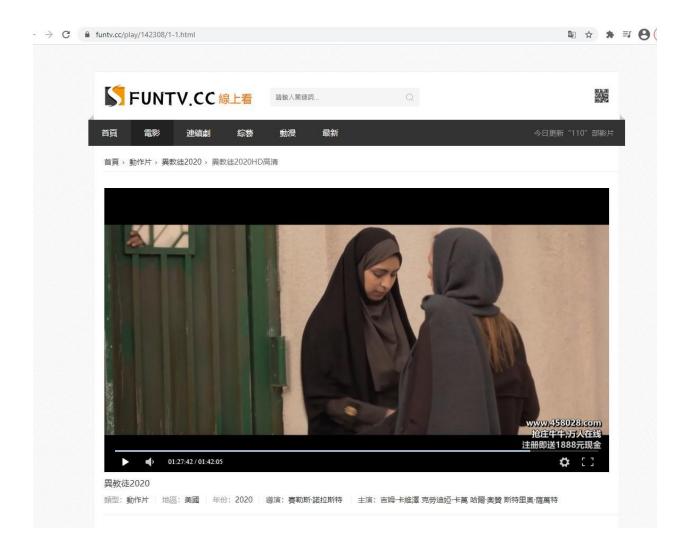
Duboju.tv





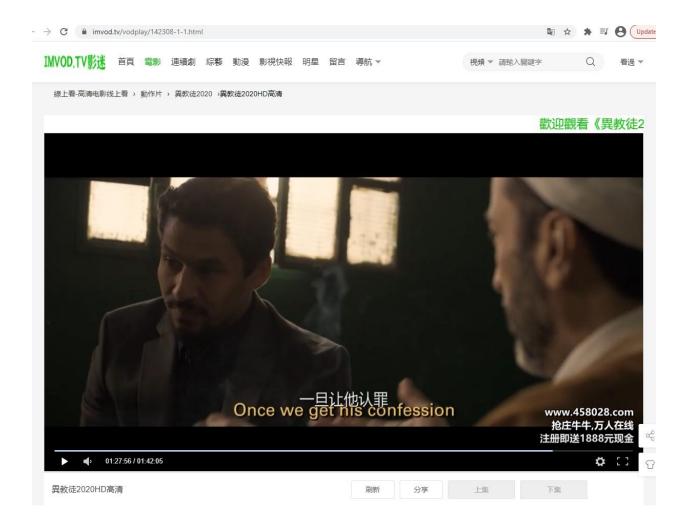
Funtv.cc



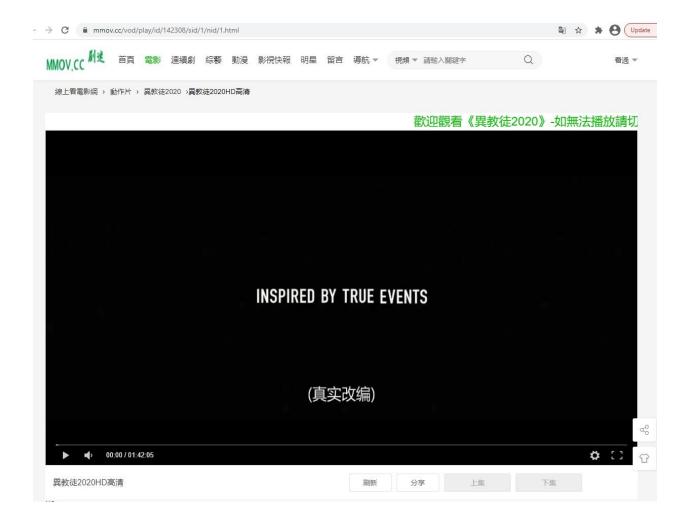


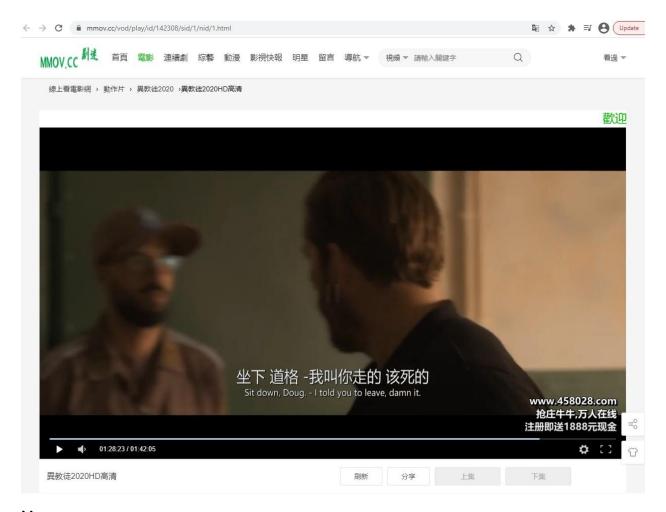
Imvod.tv



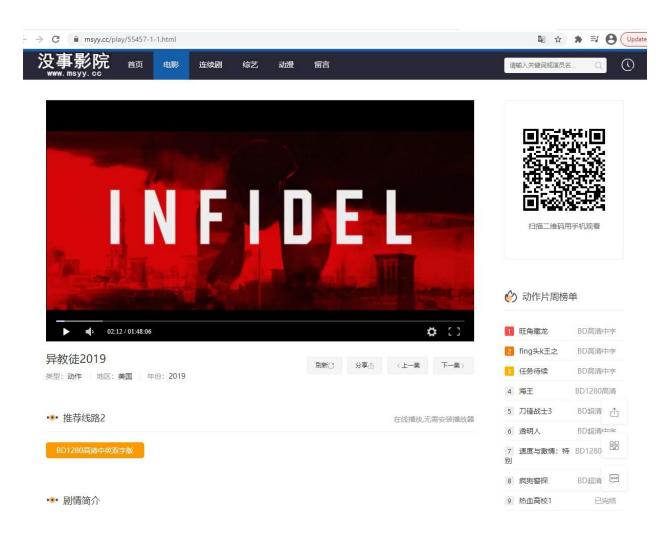


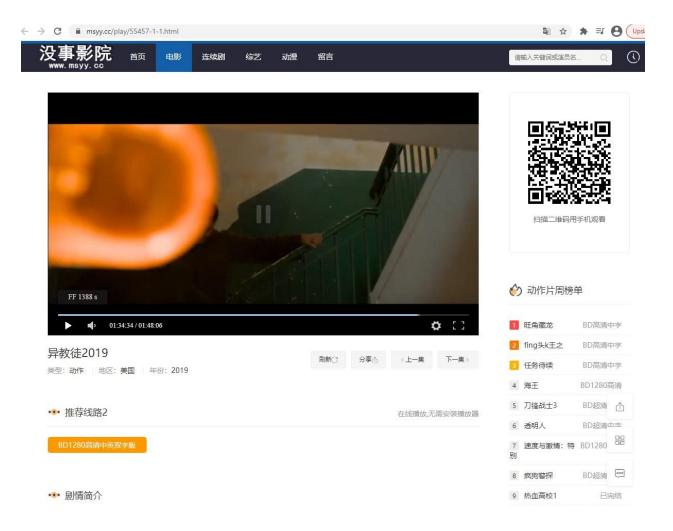
Mmov.cc



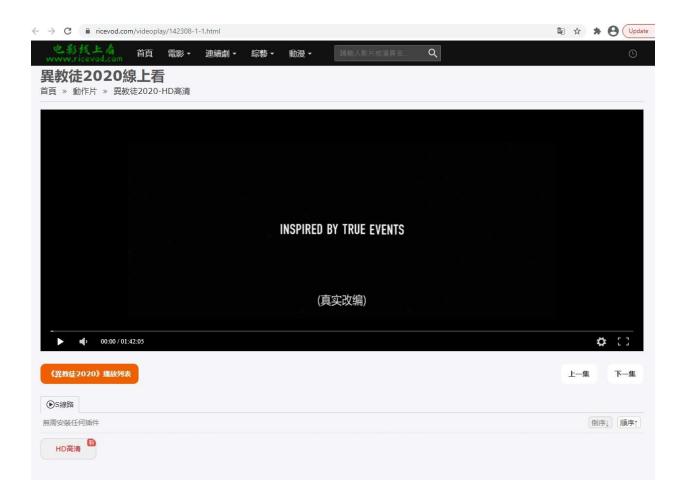


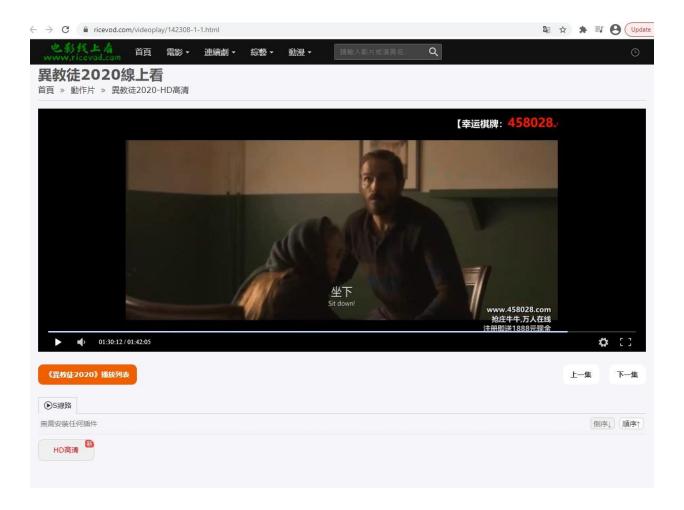
Msyy.cc



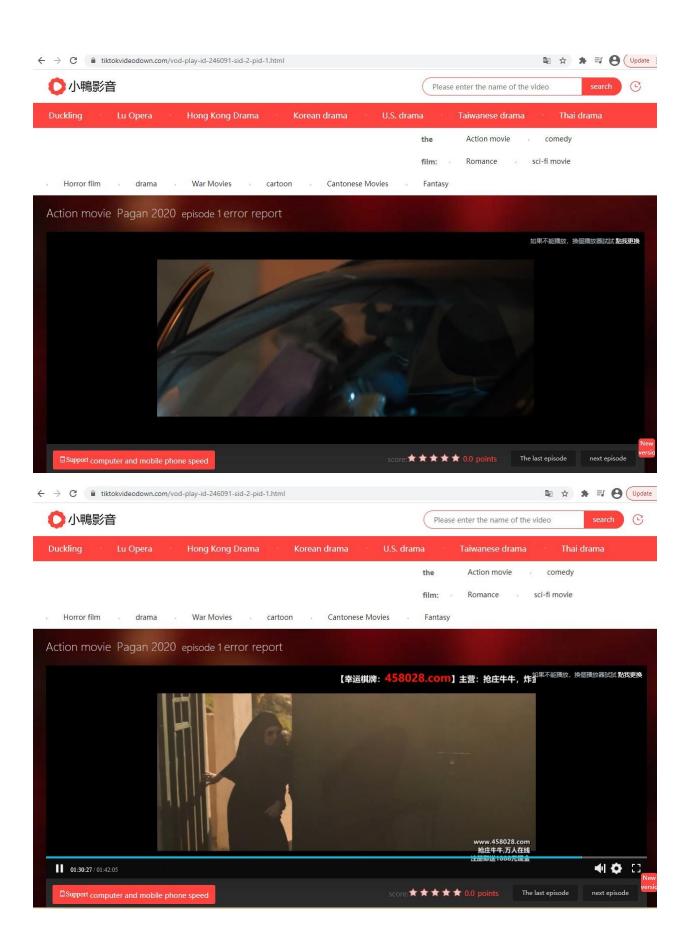


Ricevod.com





Tiktokvideodown.com





KERRY S. CULPEPPER *

ADMITTED TO PRACTICE IN VIRGINIA, HAWAI'I AND BEFORE THE USPTO

CULPEPPER IP, LLLC

Culpepper IP

JOSHUA L FF**

** ADMITTED TO PRACTICE IN

WASHINGTON AND BEFORE THE USPTO

ATTORNEY AT LAW
75-170 HUALALAI ROAD, SUITE B204
KAILUA-KONA, HI 96740

TEL: (808) 464-4047 FAX: (202) 204-5181

WWW.CULPEPPERIP.COM

PATENTS, TRADEMARKS & COPYRIGHTS

Via Email: < copyrightclaims@godaddy.com>

Via First Class Mail

Copyright Agent GoDaddy.com, LLC 14455 N. Hayden Rd. Scottsdale, AZ 85260

March 25, 2021

Re: Copyright Claim of allegation of contributory copyright infringement on websites registered or affiliated with Godaddy

Dear Sir or Madam:

A physical or electronic signature of the copyright owner, or a person authorized to act on behalf of the owner, of an exclusive copyright that has allegedly been infringed.

Joshua Lee authorized to act on behalf of owner <u>American Cinema International, Inc.</u>
/Joshua Lee/

Identification of the copyrighted work claimed to have been infringed, or, if multiple copyrighted works at a single online site are covered by a single notification, a representative list of such works on that site.

Infringements of the motion picture <u>Infidel</u> at the website: https://www.msyy.cc/play/55457-1-1.htmlhttps://www.funtv.cc/play/142308/1-1.html

Identification of the material that is claimed to be infringing or to be the subject of infringing activity and that is to be removed or access to which is to be disabled, and information reasonably sufficient to permit Godaddy to locate the material.

(1) streams and copies of the motion picture <u>Infidel</u> distributed at following web domain:

Website	
Msyy.cc	

(2) Screenshots provided below

Information reasonably sufficient to permit Godaddy to contact the Complaining Party, such as an address, telephone number, and, if available, an electronic mail address at which the Complaining Party may be contacted.

Joshua Lee, Esq.,
Culpepper IP, LLLC,
75-170 Hualalai Road,
Suite B204,
Kailua-Kona, Hawaii 96740
US Tel 1-808-464-4047
joshua.lee@culpepperip.com

A statement that the Complaining Party has a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

I have a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

Further, I have considered fair use.

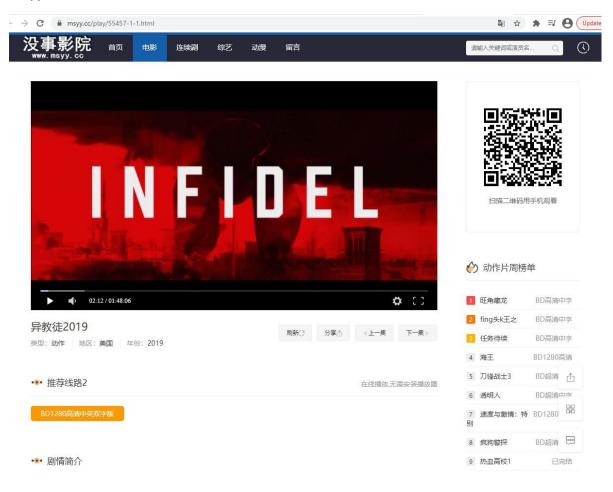
A statement that the information in the notification is accurate, and under penalty of perjury, that the Complaining Party is the owner, or is authorized to act on behalf of the owner, of an exclusive right that is allegedly infringed.

The information in the notification is accurate, and under penalty of perjury, I am authorized to act on behalf of the owner, <u>American Cinema International</u>, <u>Inc.</u>, of an exclusive right that is allegedly infringed.

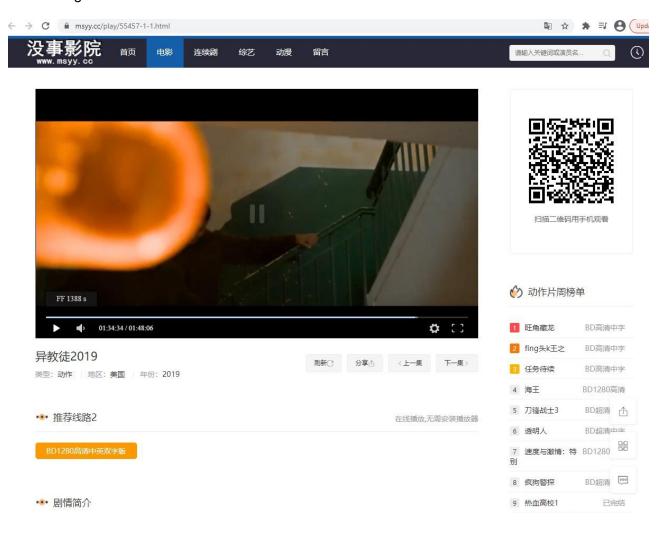
Sincerely, /Joshua Lee/ Joshua Lee

Screenshots:

Msyy.cc



Page 4





KERRY S. CULPEPPER *

ADMITTED TO PRACTICE IN VIRGINIA, HAWAI'I AND BEFORE THE USPTO

CULPEPPER IP, LLLC

JOSHUA LEE**

ATTORNEY AT LAW

75-170 HUALALALROAD SUITE B204 KAILUA-KONA, HI 96740

> TEL: (808) 464-4047 FAX: (202) 204-5181

WWW.CULPEPPERIP.COM

PATENTS, TRADEMARKS & COPYRIGHTS

** ADMITTED TO PRACTICE IN WASHINGTON AND BEFORE THE USPTO

Via Email: < legal@namecheap.com>

Via First Class Mail

Sergio Hernandez Namecheap, Inc. Legal 4600 East Washington Street, Suite 305 Phoenix, AZ 85034

March 25, 2021

Re: Copyright Claim of allegation of contributory copyright infringement on websites registered or affiliated with Namecheap

Dear Sir or Madam:

A physical or electronic signature of the copyright owner, or a person authorized to act on behalf of the owner, of an exclusive copyright that has allegedly been infringed.

Joshua Lee authorized to act on behalf of owner American Cinema International, Inc. /Joshua Lee/

Identification of the copyrighted work claimed to have been infringed, or, if multiple copyrighted works at a single online site are covered by a single notification, a representative list of such works on that site.

Infringements of the motion picture **Infidel** at the websites:

https://92-tv.xyz/vod/play/id/25865/sid/6/nid/1.html

https://92-tv.xyz/vod/play/id/25865/sid/5/nid/1.html

https://92-tv.xyz/vod/play/id/25865/sid/2/nid/1.html

https://92-tv.xyz/vod/play/id/25865/sid/1/nid/1.html

https://94-tv.xyz/vod/play/id/25865/sid/6/nid/1.html

https://94-tv.xyz/vod/play/id/25865/sid/1/nid/1.html

https://94-tv.xyz/vod/play/id/25865/sid/5/nid/1.html

https://94-tv.xyz/vod/play/id/25865/sid/2/nid/1.html
https://17drama.org/vod/play/id/25865/sid/6/nid/1.html
https://17drama.org/vod/play/id/25865/sid/1/nid/1.html
https://17drama.org/vod/play/id/25865/sid/5/nid/1.html
https://17drama.org/vod/play/id/25865/sid/2/nid/1.html
https://tocom/vod/play/id/25865/sid/6/nid/1.html
https://www.92-tv.com/vod/play/id/25865/sid/6/nid/1.html
https://tw.fun-tv.net/vod/play/id/25865/sid/6/nid/1.html
https://tw.fun-tv.net/vod/play/id/25865/sid/6/nid/1.html
https://tw.fun-tv.net/vod/play/id/25865/sid/5/nid/1.html
https://gimy.club/vod/play/id/25865/sid/6/nid/1.html
https://gimy.club/vod/play/id/25865/sid/2/nid/1.html
https://gimy.club/vod/play/id/25865/sid/5/nid/1.html
https://gimy.club/vod/play/id/25865/sid/5/nid/1.html
https://gimy.club/vod/play/id/25865/sid/5/nid/1.html

Identification of the material that is claimed to be infringing or to be the subject of infringing activity and that is to be removed or access to which is to be disabled, and information reasonably sufficient to permit Namecheap to locate the material.

(1) streams and copies of the motion picture <u>Infidel</u> distributed at following web domain:

Website
92-tv.xyz
94-tv.xyz
17drama.org
92-tv.com
Awsltv.com
Tw.fun-tv.net
Gimy.club

(2) Screenshots provided below

Information reasonably sufficient to permit Namecheap to contact the Complaining Party, such as an address, telephone number, and, if available, an electronic mail address at which the Complaining Party may be contacted.

Joshua Lee, Esq.,

Culpepper IP, LLLC,

75-170 Hualalai Road,

Suite B204,

Kailua-Kona, Hawaii 96740

US Tel 1-808-464-4047

joshua.lee@culpepperip.com

A statement that the Complaining Party has a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

I have a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

Further, I have considered fair use.

A statement that the information in the notification is accurate, and under penalty of perjury, that the Complaining Party is the owner, or is authorized to act on behalf of the owner, of an exclusive right that is allegedly infringed.

The information in the notification is accurate, and under penalty of perjury, I am authorized to act on behalf of the owner, <u>American Cinema International</u>, <u>Inc.</u>, of an exclusive right that is allegedly infringed.

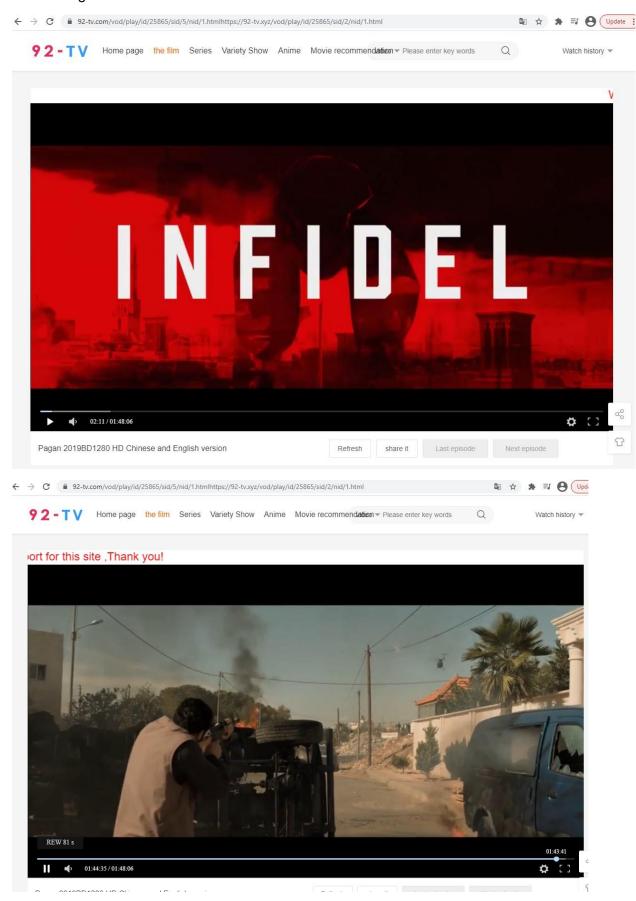
Sincerely, /Joshua Lee/

Joshua Lee

Screenshots:

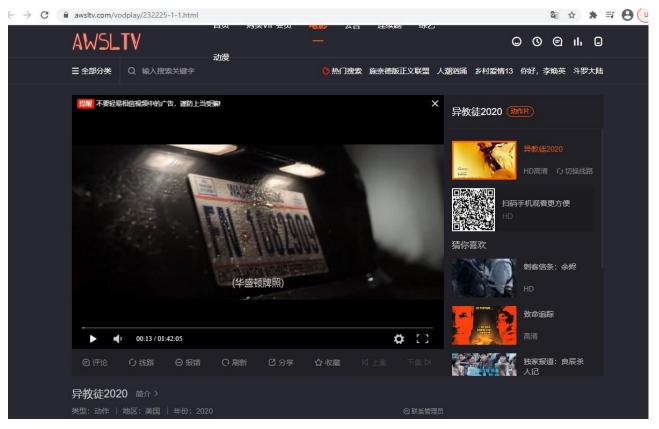
92-tv.com

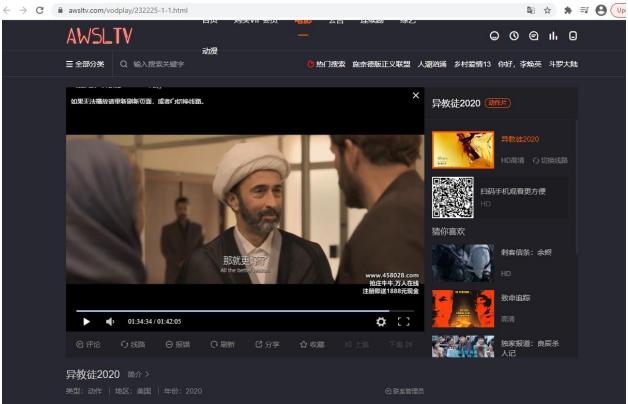
Page 4



Page 5

Awsltv.com







KERRY S. CULPEPPER *

ADMITTED TO PRACTICE IN VIRGINIA, HAWAI'I AND BEFORE THE USPTO

CULPEPPER IP, LLLC

JOSHUA L FF**

ATTORNEY AT LAW

75-170 HUALALALROAD SUITE B204 KAILUA-KONA, HI 96740

> TEL: (808) 464-4047 FAX: (202) 204-5181

WWW.CULPEPPERIP.COM

** ADMITTED TO PRACTICE IN WASHINGTON AND BEFORE THE USPTO

PATENTS, TRADEMARKS & COPYRIGHTS

Via Email: < legal@namesilo.com>

Via First Class Mail

Kristaps Ronka NameSilo, LLC 1300 E. Missouri Avenue, Suite A-110 Phoenix, AZ 85014

March 25, 2021

Re: Copyright Claim of allegation of contributory copyright infringement on websites registered or affiliated with Namesilo

Dear Sir or Madam:

A physical or electronic signature of the copyright owner, or a person authorized to act on behalf of the owner, of an exclusive copyright that has allegedly been infringed.

Joshua Lee authorized to act on behalf of owner American Cinema International, Inc. /Joshua Lee/

Identification of the copyrighted work claimed to have been infringed, or, if multiple copyrighted works at a single online site are covered by a single notification, a representative list of such works on that site.

Infringements of the motion picture **Infidel** at the websites:

https://www.tiktokvideodown.com/vod-play-id-246091-sid-2-pid-1.html

https://www.tiktokvideodown.com/vod-play-id-246091-sid-1-pid-1.html

https://cn.tvju.tv/vodplay/142308-1-1.html

https://cn.52ys.tv/vod/play/id/142308/sid/1/nid/1.html

https://www.imvod.tv/vodplay/142308-1-1.html

https://www.zhuijuju.com/vodplay/128747-1-1.html

https://www.236230.com/vodplay/84654-1-1/

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https://www.funtv.cc/play/142308/1-1.html

https://www.17tv.tv/vp/42200-1-1.html

https://www.duboju.tv/vodplay/118178-1-1.html

https://www.ricevod.com/videoplay/142308-1-1.html

https://www.17ys.net/vodplay/142308-1-1.html

https://www.mmov.cc/vod/play/id/142308/sid/1/nid/1.html

Identification of the material that is claimed to be infringing or to be the subject of infringing activity and that is to be removed or access to which is to be disabled, and information reasonably sufficient to permit Namesilo to locate the material.

(1) streams and copies of the motion picture <u>Infidel</u> distributed at following web domain:

Website
Tiktokvideodown.com
Cn.tvju.tv
Cn.52ys.tv
Imvod.tv
Zhuijuju.com
236230.com
Funtv.cc
17tv.tv
Duboju.tv
Ricevod.com
17ys.net
Mmov.cc

Information reasonably sufficient to permit Namesilo to contact the Complaining Party, such as an address, telephone number, and, if available, an electronic mail address at which the Complaining Party may be contacted.

Joshua Lee, Esq.,

Culpepper IP, LLLC,

75-170 Hualalai Road,

Page 3

Suite B204,

Kailua-Kona, Hawaii 96740

US Tel 1-808-464-4047

joshua.lee@culpepperip.com

A statement that the Complaining Party has a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

I have a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

Further, I have considered fair use.

A statement that the information in the notification is accurate, and under penalty of perjury, that the Complaining Party is the owner, or is authorized to act on behalf of the owner, of an exclusive right that is allegedly infringed.

The information in the notification is accurate, and under penalty of perjury, I am authorized to act on behalf of the owner, <u>American Cinema International, Inc.</u>, of an exclusive right that is allegedly infringed.

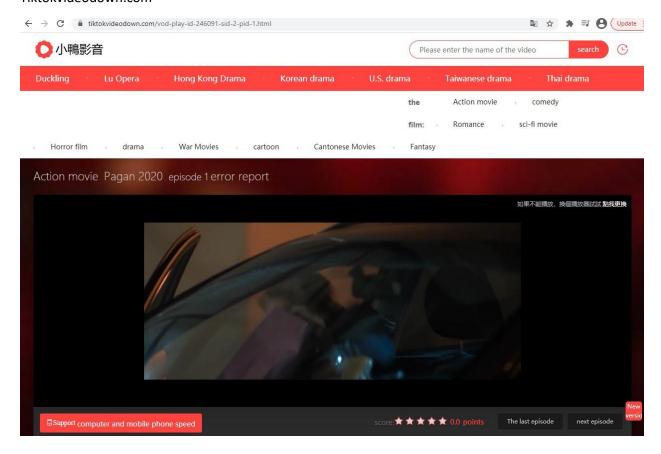
Sincerely, /Joshua Lee/

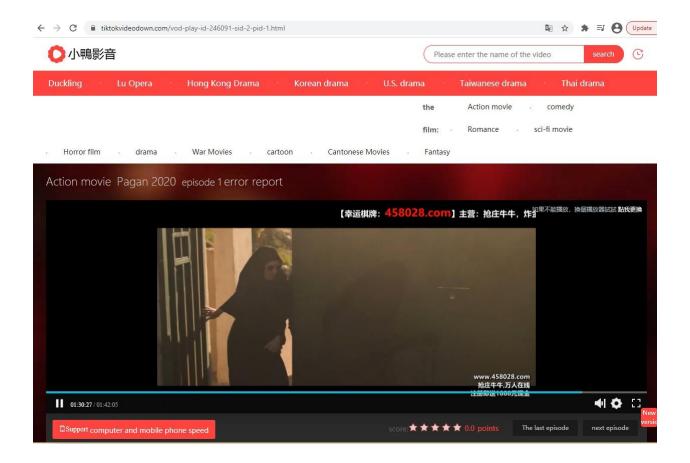
Joshua Lee

Attached: Screenshots

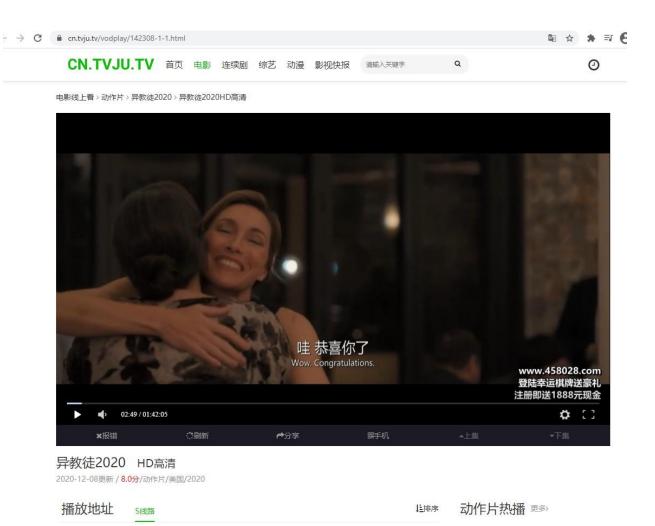
Screenshots:

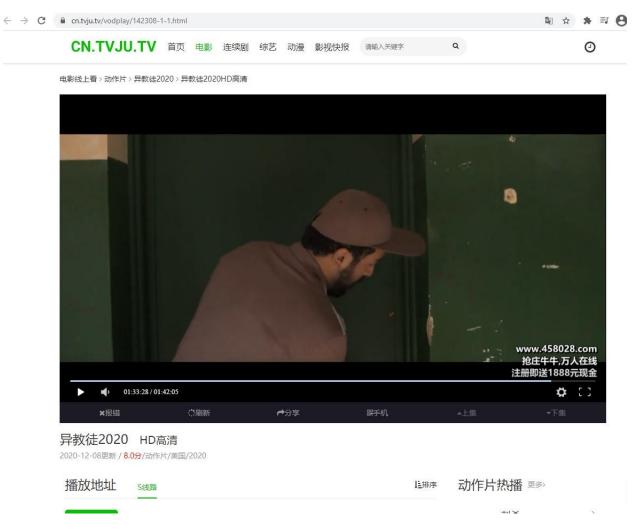
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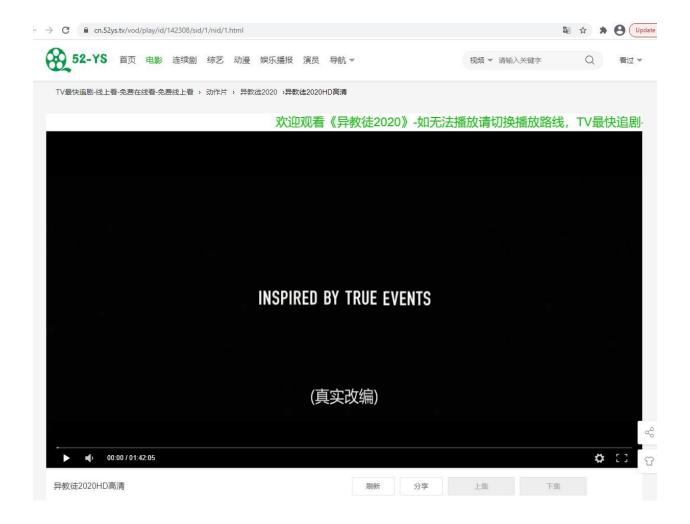


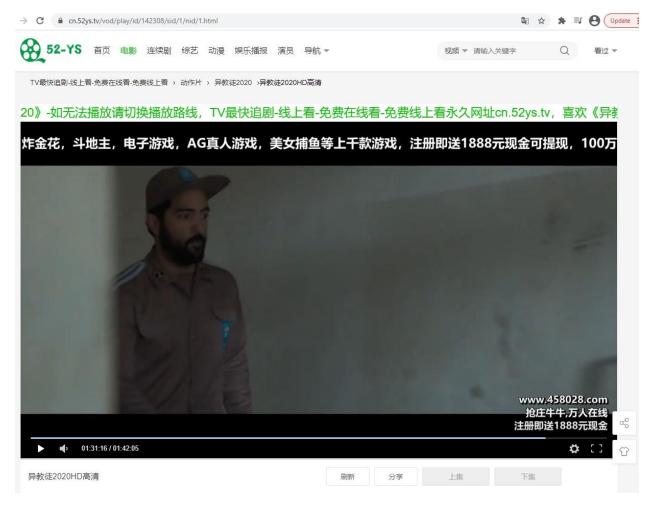
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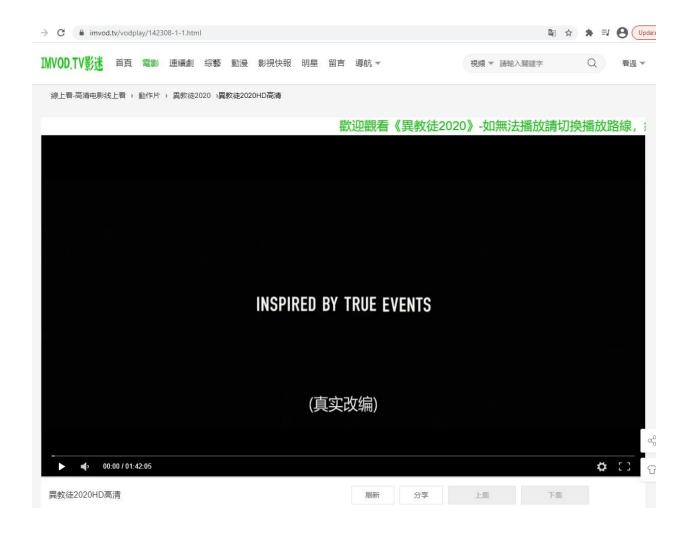


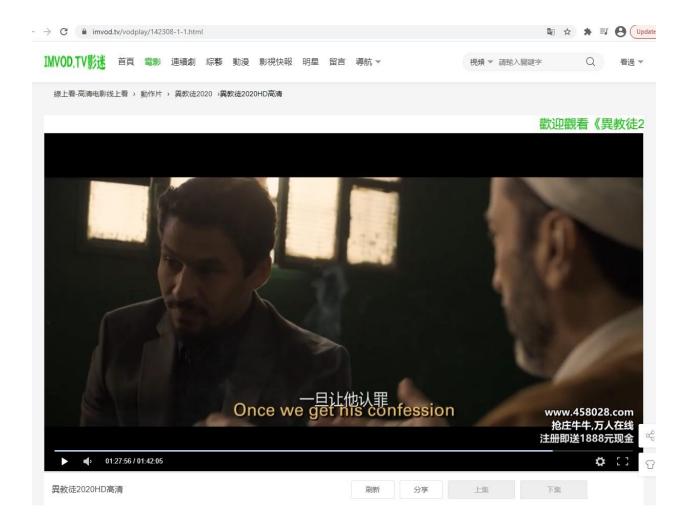
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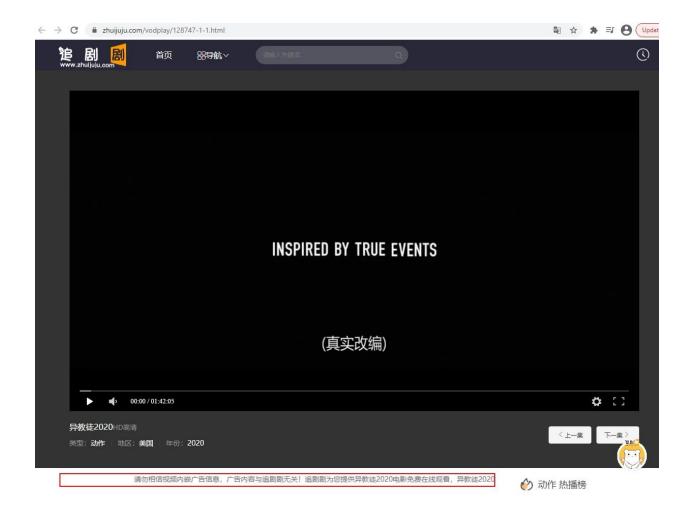


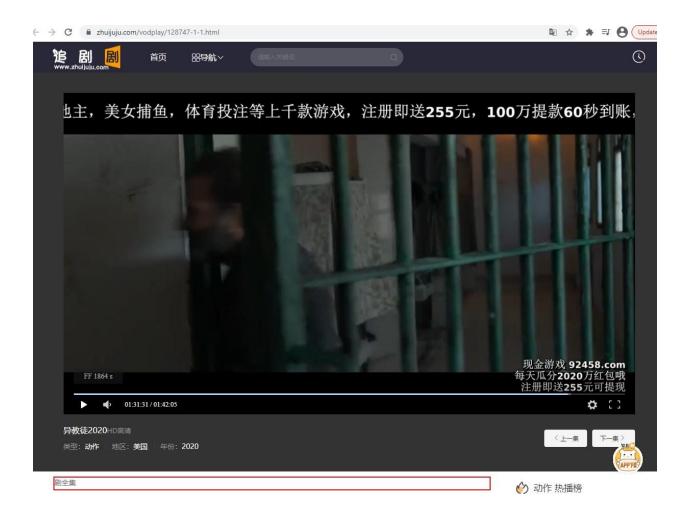
Imvod.tv



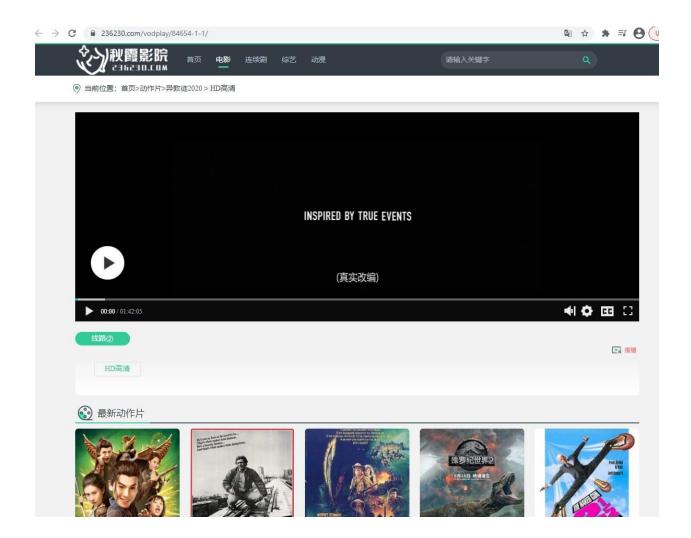


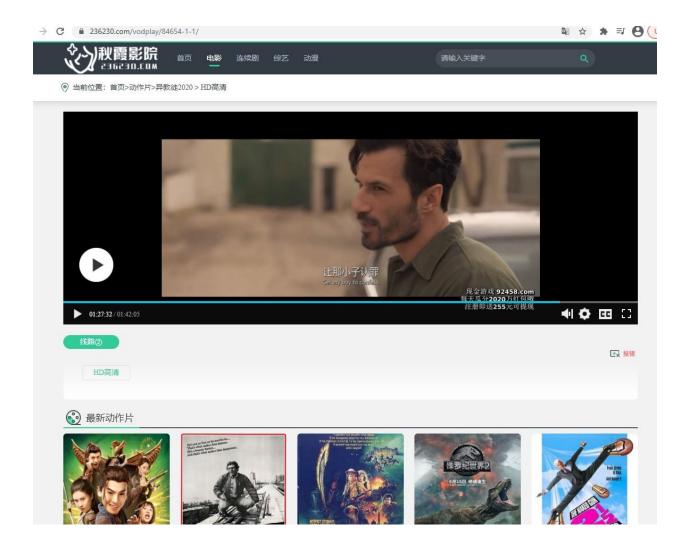
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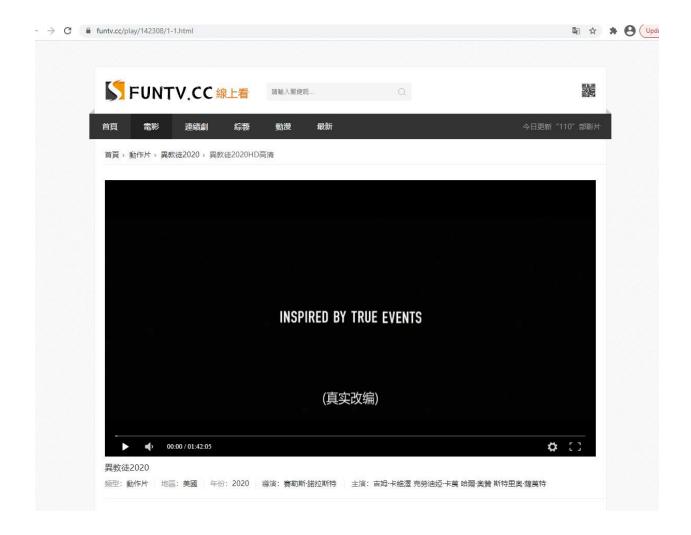


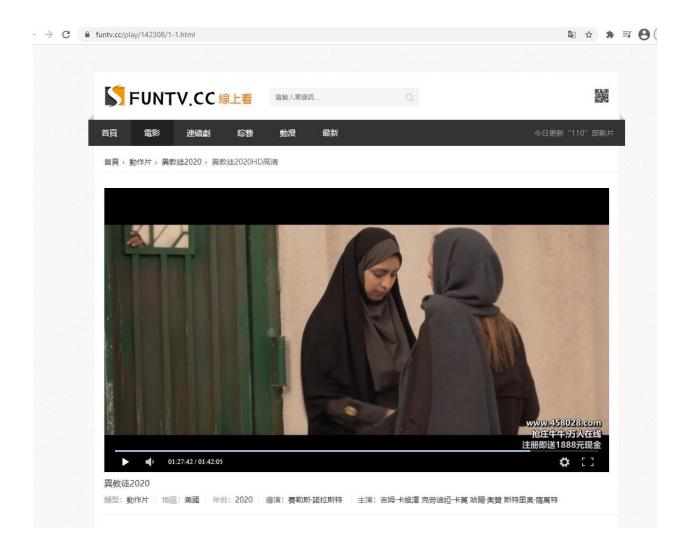
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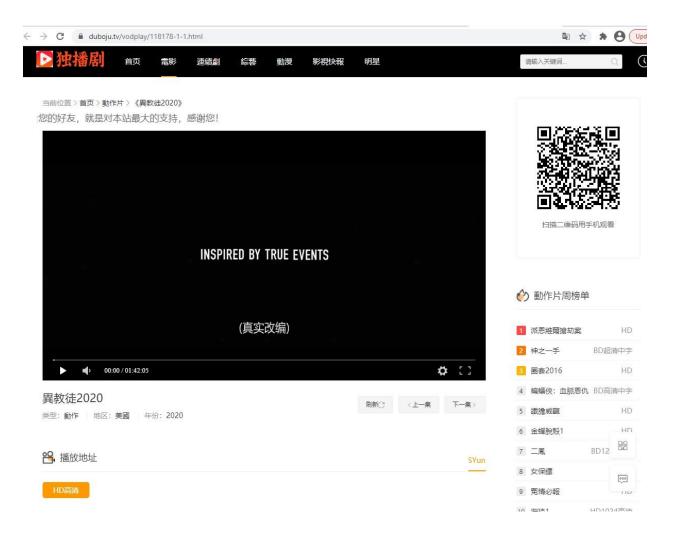
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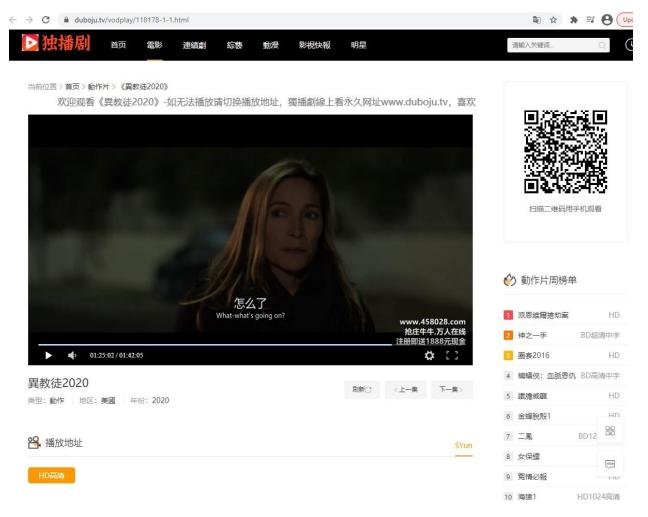
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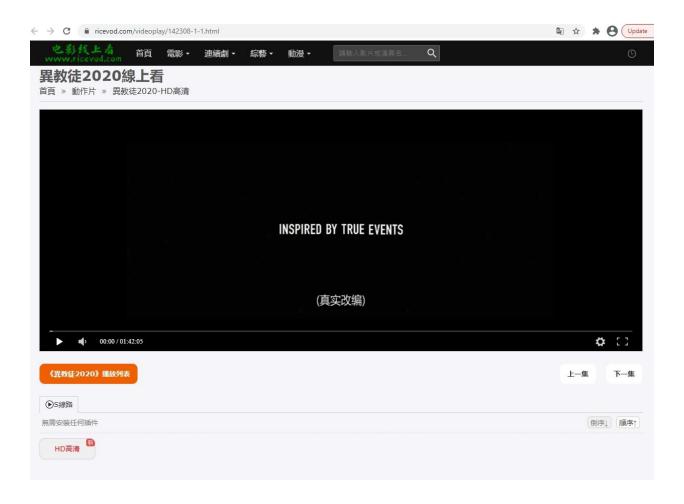


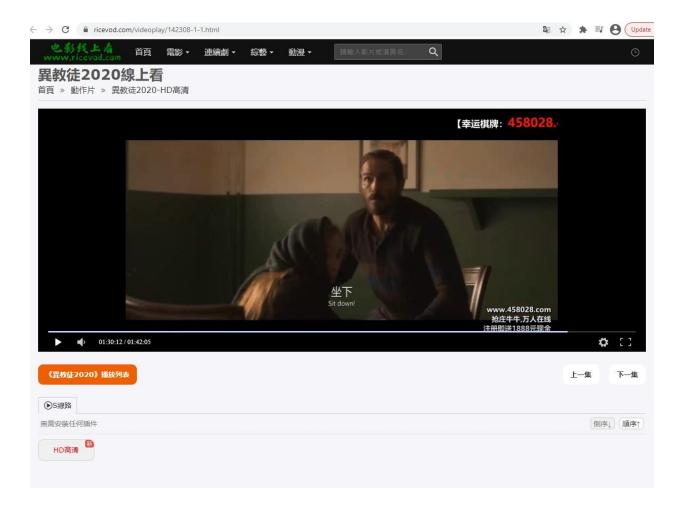
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